

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DAVID BURNETT AND DAVID NELSON

as representatives of a class of similarly
situated persons and on behalf of the
WESTERN GLOBAL AIRLINES, INC.
EMPLOYEE STOCK OWNERSHIP
PLAN,

C.A. No. 1:22-cv-00270-RGA/JLH

Plaintiffs,

v.

PRUDENT FIDUCIARY SERVICES, LLC,
MIGUEL PARADES, JAMES K. NEFF,
CARMIT P. NEFF, JAMES K. NEFF
REVOCABLE TRUST DATED 11/15/12,
CARMIT P. NEFF REVOCABLE TRUST
DATED 11/15/12, KELLY S. NEFF TRUST
DATED 1/1/10, DANIELLE J. NEFF
TRUST DATED 1/1/10 and WGA TRUST
DATED 8/16/13,

Defendants.

**PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENTS**

Under Federal Rule of Civil Procedure Rule 23(e), Plaintiffs, on behalf of themselves and the Class, move for final approval of the class action settlement agreement among Plaintiffs and Defendants James K. Neff, Carmit P. Neff, James K. Neff Revocable Trust Dated 11/15/12, Carmit P. Neff Revocable Trust, Dated 11/15/12, Kelly S. Neff Trust Dated 1/1/10, Danielle J. Neff Trust Dated 1/1/10, and WGA Trust Dated 8/16/13 (collectively, the "Shareholder Defendants") (D.I. 143-1 at 1-58), and the separate class action settlement between Plaintiffs and Defendants Prudent Fiduciary Services, LLC, and Miguel Paredes (the "Trustee Defendants") (D.I. 143-1 at 59-109). Plaintiffs have conferred with counsel for the Shareholder Defendants, who do not oppose the

Motion. Plaintiffs have also conferred with counsel for the Trustee Defendants, who also do not oppose the Motion.

This Motion is made based on the accompanying Opening Brief, the Declaration of Brock J. Specht and accompanying exhibit filed herewith, and all other documents, pleadings, argument, and materials presented to the Court.

Dated: November 26, 2024

Respectfully submitted,

By: /s/ Carmella P. Keener
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